

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE

SUITE 3W8

LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

February 1, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Aragon v. Brahspati, Inc., et al.
Case No.: 1:22-cv-6342 (EK) (PK)

Dear Judge Kuo:

This office represents the Defendants in the above-referenced case. Defendants write to respectfully request a two (2) week extension of time, from January 30, 2023 through February 13, 2023, to respond to the complaint.

Consistent with Section IV of this Court's Individual Practice Rules, Defendants submit that:

(i) the current deadline to respond to the complaint is January 30, 2023 (see Text Only Order dated January 9, 2023);

(ii) an extension of time is needed because your undersigned will be conducting depositions all day tomorrow and Friday, February 3, 2023 and has been engaged in preparation for same all week;

(iii) there have been no previous requests to this Court for an extension of time to comply with this deadline; and

(iv) Plaintiff was unable to be reached to ascertain whether he consents to this specific request due to the late hour it is made,¹ but Defendants respectfully note that Plaintiff previously consented to an extension of time of sixty (60) days during a time in which this office was in the process of being retained by the Defendants in this case.

Accordingly, Defendants respectfully submit that good cause and excusable neglect exist to warrant an extension of time of the deadline to respond to the complaint from January 30, 2023 through February 13, 2023. See Fed. R. Civ. P. 6(b)(1)(B). Defendants thank this honorable Court for its time, attention, and anticipated courtesies in this case.

¹ Your undersigned was unable to make this request earlier in the day due to an in-person appearance before the Hon. Lois Bloom, U.S.M.J. today.

Dated: Lake Success, New York
February 1, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

Attorneys for Defendants

VIA ECF

Law Offices of Colin Mulholland
Attn: Colin Mulholland, Esq.
3097 Steinway Street, Suite 301-A
Astoria, NY 11103
cmulhollandesq@gmail.com

Attorney for Plaintiff